

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

AMANDA DEL TORO, DANIEL)
WERNER, JENNIFER MCGREGOR-)
HALSTEAD, JOSHUA CHROMICK)
AND ALL OTHERS SIMILARLY) Case No. 4:19-cv-02635-JAR
SITUATED,)
)
Plaintiffs,)
)
vs.)
CENTENE MANAGEMENT)
COMPANY, LLC,)
)
Defendant.)
)
)
)

**[PROPOSED] ORDER GRANTING JOINT MOTION FOR APPROVAL OF
SETTLEMENT AND DISMISSING LAWSUIT WITH PREJUDICE**

This matter comes before the Court on the parties' Joint Motion for Approval of Settlement ("Motion"). Having considered the parties' Motion and supporting Memorandum and exhibits, including the parties' Confidential Settlement Agreement, the Court hereby GRANTS the parties' Motion and ORDERS as follows:

1. The Settlement is a fair and reasonable resolution of a *bona fide* dispute over wages owed under the Fair Labor Standards Act. The Settlement is approved with respect to the Named Plaintiff, Opt-in Plaintiffs, and Participating Settlement Class Members, and is binding on all of them as defined in the Settlement Agreement and this Order. The terms of the Parties' Settlement Agreement are incorporated by reference into this Order.

2. The Court previously conditionally certified a seven-state FLSA collective pursuant to 29 U.S.C. § 216(b). The Court approves and adopts the amended definition of the FLSA collective contained in the Settlement Agreement, Section I, for settlement purposes only.

3. The Service Awards to the Named Plaintiffs and Opt-in Plaintiffs to be paid out of the Gross Settlement Fund are approved.

4. Plaintiffs' Counsel's request for attorneys' fees in the amount of 35% of the Gross Settlement Fund and litigation expenses in the amount of \$7,317.90 to be paid out of the Gross Settlement Fund is granted.

5. Rust Consulting is appointed Settlement Administrator. The request to pay the fees and costs associated with settlement administration to the Settlement Administrator from the Gross Settlement Fund is granted.

6. The form, content, and distribution method of the parties' proposed settlement notices are approved.

7. Counsel for the parties are hereby authorized to utilize all reasonable and mutually agreed procedures in connection with the administration of the settlement which are not materially inconsistent with either this Order or the terms of the Settlement Agreement.

8. The parties shall abide by all terms of the Settlement Agreement and this Order.

9. This action is dismissed with prejudice, with each party to bear his, her, or its own fees and costs, except as set forth in the Settlement Agreement.

10. The Court shall retain jurisdiction with respect to the interpretation, implementation and enforcement of the terms of the parties' Settlement Agreement and all orders and judgments entered in connection therewith.

11. The Court hereby enters Judgment approving the terms of the Settlement Agreement. This Order shall constitute a final judgment for purposes of Fed. R. Civ. P. 58.

12. The Clerk is directed to remove all dates from the Court's calendar and close the case.

DATED: _____

THE HONORABLE JOHN A. ROSS
United States District Court Judge